

DALE K. KLEVEN, ESQ.
Nevada Bar No. 007778
THOMAS M. FRONCZEK, ESQ.
Nevada Bar No. 11380
RELIEF LAWYERS, LLC
5550 Painted Mirage Rd., Ste. 320
Las Vegas, Nevada 89149
Phone: (702) 589-7520
dale@relieflawyersnv.com

TOMIO B. NARITA, ESQ. (*pro hac vice*)
California Bar No. 156576
R. TRAVIS CAMPBELL, ESQ. (*pro hac vice*)
California Bar No. 271580
SIMMONDS & NARITA LLP
50 California Street, Suite 1500
San Francisco, CA 94111
Telephone: (415) 283-1000
Facsimile: (415) 352-2625

Attorneys for Plaintiff and Counter-Defendant
Troy Capital, LLC and Third-Party Defendants
Rance Willey and Troy Dupuis

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TROY CAPITAL LLC, a Nevada Limited
Liability Company,

Plaintiff,

vs.

PATENAUDE & FELIX APC, et al.,

Defendants.

CASE NO.: 2:20-cv-00205-JCM-DJA

**STIPULATION TO EXTEND TIME TO
RESPOND TO DEFENDANTS' MOTION
TO COMPEL PRODUCTION OF
DOCUMENTS AND WITNESS
DEPOSITION**

(First Request)

Current Deadline: October 31, 2022

New Deadline: November 7, 2022

The Hon. Daniel J. Albregts

PATENAUDE & FELIX APC,

Counterclaimant/Third-Party
Plaintiff

vs.

TROY CAPITAL LLC, a Nevada Limited
Liability Company; RANCE WILLEY, an
Individual, and TROY DUPUIS, an Individual,

Counterdefendants/Third-Party
Defendants

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, the parties, through their respective counsel, stipulate to extend the time for Plaintiff to respond to Defendants' pending Motion to Compel Production of Documents and Witness Deposition (ECF No. 150), which was filed on October 17, 2022. This is the parties' first request. Good cause for this stipulation exists based on the following:

1. On October 17, 2022, Defendants filed a Motion to Compel Production of Documents and Witness Deposition. ECF No. 150. The motion seeks to compel Troy Capital to Produce various documents and compel nonparty Kelly MacBeth to appear for deposition.

2. Pursuant to the Court's Local Rules, Plaintiff and Ms. MacBeth's deadline to oppose the motion is October 31, 2022. L.R. 7-2(b). Defendants' deadline to file their reply is November 7, 2022. *Id.*

3. Good cause exists for the brief one-week extension of the deadlines. Lead counsel for Plaintiff and Ms. MacBeth, Tomio Narita, has been travelling out-of-state during the week of October 24 and has been simultaneously dealing with several pressing deadlines in other matters. As a result, counsel has not had sufficient time to dedicate to preparing the opposition briefs. In addition, co-counsel for Plaintiff and Ms. MacBeth who is assisting with the preparation of the opposition briefs, R. Travis Campbell, tested positive and was recovering from COVID-19 during the week of October 17. Accordingly, Plaintiff and Ms. MacBeth have requested, and Defendants have agreed, to extend the opposition deadline to the Motion to Compel by one week to November 7, 2022.

4. Accordingly, the parties hereby stipulate and jointly request that the Court extend the deadline for Plaintiff and Ms. MacBeth to respond to Defendants' Motion to Compel Production of Documents and Witness Deposition (ECF No. 127) to November 7, 2022, and extend the deadline for Defendants to file their reply to November 14, 2022.

5. This requested extension of time is not sought for delay or any other improper purpose. The parties respectfully submit that the reasons set forth above constitute good cause for the extension.

DATED this 28th day of October, 2022
SIMMONDS & NARITA LLP

DATED this 28th day of October, 2022
RELIEF LAWYERS, LLC

/s/R. Travis Campbell

Tomio B. Narita
(Admitted *pro hac vice*)
R. Travis Campbell
(Admitted *pro hac vice*)
44 Montgomery Street, Suite 3010
San Francisco, California 94104

Attorneys for Plaintiff/Counter-defendant
TROY CAPITAL, LLC and Third-Party Defendants
RANCE WILLEY and TROY DUPUIS

/s/Dale K. Kleven

Dale K. Kleven
Nevada Bar No. 7778
Thomas M. Fronczek
Nevada Bar, No. 11380
5550 Painted Mirage Road, Suite 320
Las Vegas, Nevada 89149

Attorneys for Plaintiff/Counterdefendant
TROY CAPITAL, LLC and Third-Party Defendants
RANCE WILLEY and TROY DUPUIS

DATED this 28th day of October, 2022
SANTORO WHITMIRE

DATED this 28th day of October, 2022
LEWIS BRISBOIS BISGAARD &
SMITH LLP

/s/Jason D. Smith

Nicholas J. Santoro
Nevada Bar No. 0532
Jason D. Smith
Nevada Bar No. 9691
10100 W. Charleston Boulevard, Suite 250
Las Vegas, Nevada 89135

Attorneys for
Counterclaimant/Third-Party Plaintiff
PATENAUDE & FELIX APC

/s/Jeffrey D. Olster

Jeffrey D. Olster
Nevada Bar No. 8864
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118

Attorneys for Defendants
PATENAUDE & FELIX APC, RAYMOND A.
PATENAUDE, MICHAEL D. KAHN and ANGIE
HONG HOAR

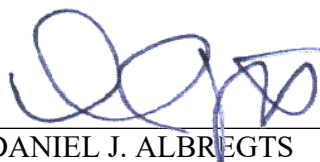
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/s/R. Travis Campbell

Tomio B. Narita
(Admitted *pro hac vice*)
R. Travis Campbell
(Admitted *pro hac vice*)
44 Montgomery Street, Suite 3010
San Francisco, California 94104

Attorneys for Nonparty
KELLY MACBETH

IT IS SO ORDERED:



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: 10/31/2022